

1 Christopher R. Pitoun (SBN 290235)
2 Jacob P. Berman (SBN 327179)
3 Abigail D. Pershing (SBN 346467)
4 HAGENS BERMAN SOBOL SHAPIRO LLP
5 301 North Lake Avenue, Suite 920
6 Pasadena, CA, 91101
7 Telephone: (213) 330-7150
8 christopherp@hbsslaw.com
9 jakeb@hbsslaw.com
10 abigailp@hbsslaw.com

11 Shelby R. Smith (admitted *pro hac vice*)
12 HAGENS BERMAN SOBOL SHAPIRO LLP
13 1301 Second Avenue, Suite 2000
14 Seattle, WA 98101
15 Telephone: (206) 623-7292
16 shelby@hbsslaw.com

17 *Attorneys for Plaintiff Jane Doe*

18 UNITED STATES DISTRICT COURT
19 CENTRAL DISTRICT OF CALIFORNIA

20 JANE DOE,

21 Plaintiff,

22 v.

23 COUNTY OF SANTA BARBARA,
24 JOSHUA ELIZALDE & JOHN
25 DOES 1-10,

26 Defendants.

Case No.: 2:24-cv-04334-MEMF-SK

**PLAINTIFF'S UNOPPOSED MOTION
TO REMOVE INCORRECTLY
FILED DOCUMENT NOS. 67-20 AND
67-23**

Hon. Maame Ewusi-Mensah Frimpong
Mag. Hon. Steve Kim

TO THE HONORABLE COURT AND DEFENDANTS:

Plaintiff files this Administrative Motion to Remove Incorrectly Filed ECF Document Nos. 67-20 and 67-23, submitted electronically on October 2, 2025 by counsel for Defendant County of Santa Barbara. ECF Document Nos. 67-20 and 67-23 are exhibits filed in support of the Parties' Joint Brief Regarding Defendant County Santa Barbara's Motion for Partial Summary Judgment ("Parties' Joint Brief") that inadvertently reveal sensitive and confidential information. This Court has already ordered this information sealed for other exhibits filed in support of the Parties' Joint Brief. Plaintiff respectfully requests that the Court order the Clerk of the Court to remove ECF Documents Nos. 67-20 and 67-23 from the docket in the captioned matter.

Upon learning of this error, on the evening of December 10, 2025 Plaintiff emailed the ECF Help Desk and the Courtroom Deputy at MEMF_Chambers@cacd.uscourts.gov to lock the document and restrict access.

Plaintiff will file an Administrative Motion to File Under Seal shortly, along with new public versions of Document Nos. 67-20 and 67-23 that redact the sensitive and confidential information.

On December 10, 2025, Plaintiff informed Defendants County of Santa Barbara and Joshua Elizalde ("Defendants") of her intent to file this motion via email. Defendants do not oppose this filing.

Plaintiff hereby respectfully requests that an order be granted to remove the documents filed as ECF Nos. 67-20 and 67-23.

1 Dated: December 10, 2025

Respectfully submitted,

2 HAGENS BERMAN SOBOL SHAPIRO LLP

3 By /s/ Christopher R. Pitoun

4 Christopher R. Pitoun (SBN 290235)

5 Jacob P. Berman (SBN 327179)

6 Abigail D. Pershing (SBN 346467)

HAGENS BERMAN SOBOL SHAPIRO LLP

7 301 North Lake Avenue, Suite 920

8 Pasadena, CA, 91101

Telephone: (213) 330-7150

9 christopherp@hbsslaw.com

10 jakeb@hbsslaw.com

abigailp@hbsslaw.com

11 Shelby R. Smith (admitted *pro hac vice*)

12 HAGENS BERMAN SOBOL SHAPIRO LLP

13 1301 Second Avenue, Suite 2000

14 Seattle, WA 98101

Telephone: (206) 623-7292

15 Facsimile: (206) 623-0594

16 shelby@hbsslaw.com

17 *Attorneys for Plaintiff Jane Doe*